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February 28, 2012

Via Facsimile

The Honorable Douglas E. Arpert
United States Magistrate Judge
Clarkson S. Fisher Fed. Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

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Re: Jacobson v. Synthes, Inc., et al.

Docket No.: 11-CV-01160 (AET) (DEA)
Sedgwick File No.: 00484-020548

Dear Judge Arpert:

We represent defendant Synthes USA Sales, LLC ("Synthes") (incorrectly pled as Synthes, Inc.) in this products liability case involving an implanted orthopaedic device.

A telephone status conference is scheduled in the above-referenced matter for Wednesday, February 29, 2012. Defendant is not available for the February 29, 2012, conference due to a scheduling conflict. Accordingly, the parties are submitting a joint request to adjourn this conference to Monday, March 12, 2012, or as soon thereafter as may be convenient to the Court.

at 3 PM Plaintiff's counsel shall initiate the call.

The parties recognize that the fact discovery cut-off in this matter is set for Friday, March 2, 2012. There are a few outstanding fact discovery issues for which the parties will seek an extension, including the deposition of treating physician, Dr. James Cozzarelli. The parties are working with Dr. Cozzarelli's counsel to schedule this deposition. The parties do not believe that the extension of fact discovery will affect expert discovery deadlines.

Respectfully submitted,

David M. Covey
SEDGWICK LLP

cc: (via facsimile)
Erik Anderson, Esq.
Reardon Anderson LLC
55 Gilbert Street North, Suite 2204
Tinton Falls, New Jersey 07701

- Dr. Cozzarelli's deposition shall be completed
by March 23, 2012.

So Ordered this 28th day
of February, 2012

Douglas E. Arpert, U.S.M.J.